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8 BANK OF AMERICA CORPORATION, and STEVE
9 OWEN

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12 Attorneys for Plaintiff AHMED WAHBA

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 AHMED WAHBA

17 Case No. 09-CV-04916-RS

18 Plaintiff,

19 v.

20 BANK OF AMERICA, NATIONAL
21 ASSOCIATION; BANK OF AMERICA
22 CORPORATION; STEVE OWEN, Manager,
BANK OF AMERICA, Hayward, California;
and DOES 1 to 25, Inclusive

**STIPULATED REQUEST TO
CHANGE TIME PURSUANT TO
CIVIL L.R. 6-2 AND [PROPOSED]
ORDER**

Judge: Hon. Richard Seeborg

Trial Date: March 7, 2011

23 Defendants.

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STIPULATION

1. Though their undersigned counsel, Defendants Bank of America, National Association, Bank of America Corporation, and Steve Owen (collectively “Defendants”), and Plaintiff Ahmed Wahba hereby stipulate and agree to continue the deadline for designating expert testimony and disclosure of full expert reports from August 6, 2010 to November 5, 2010.

2. This modification will afford the parties more time to prepare expert disclosures, which would otherwise be due on July 9, 2010. The modification would also bring the timing for expert discovery closer to the time of trial, which has been extended out until early 2011.

3. The only other time modification by stipulation that has been requested in this matter was to continue the trial date. That modification was ordered by the Court on April 22, 2010.

3. The only effect of this request on the schedule for the case would be to move dates for service of expert disclosures and disclosure of rebuttal expert reports back by approximately three months. This stipulation would not impact deadlines for propounding non-expert discovery, nor would it change the current trial schedule.

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1 4. Both parties agree to the stipulation as indicated by their signatures below.
2 The parties respectfully request that the Court approve the Stipulation, pursuant to Civil L.R. 6-2
3 and enter an Order thereupon. A form of proposed Order is filed herewith.

4
5 DATED: June 25, 2010

Respectfully submitted,

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7
8 ORRICK, HERRINGTON & SUTCLIFFE

9
10 By: /s/ Katina B. Miner
11 Katina B. Miner

12
13 Attorneys for Defendants Bank of America, National
14 Association, Bank of America Corporation, and
15 Steve Owen

16 DATED: June 25, 2010

17 LAW OFFICES OF CURTIS G. OLER

18
19 By: /s/
20 Curtis G. Oler

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22 Attorneys for Plaintiff Ahmed Wahba

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24 I hereby attest that the concurrence in the filing of this document has been
25 obtained from Curtis G. Oler, Attorneys for Plaintiff, AHMED WAHBA.

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ORDER

The Court having considered the above Stipulation, and good cause appearing therefore,

IT IS HEREBY ORDERED that the scheduled deadline for designating expert testimony and disclosure of full expert reports shall be rescheduled for November 5, 2010.

DATED: June 29, 2010


Judge Richard Seeborg
UNITED STATES DISTRICT JUDGE